

# **Exhibit E**

**Samanta, Tina**

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**From:** Willsey, Peter [pwillsey@cooley.com]  
**Sent:** Thursday, January 31, 2008 12:16 PM  
**To:** Samanta, Tina  
**Cc:** McKinnon, Shannon; Wieder, Stephen; Bennett, Iris E; Christopher McGrath; sdonofrio@mindspring.com; jlg@jlgraubart.com; Arato, Cynthia S.; Hughes, Brendan; Barenholtz, Celia Goldwag  
**Subject:** RE: In re: XM Satellite Radio Copyright Litigation

Tina --

Following up on my email below, based on feedback from our vendor we expect to produce approximately 4,000-5,000 documents tomorrow. We further expect that the second wave of documents in our rolling production will go out by the middle of next week and will include approximately 15,000 to 20,000 documents.

It is premature to give you a number for the total production, as there are numerous variables at play and we simply cannot give you an accurate projection at this time. That said, we will do our best to keep you posted as to the expected timing and volume of our production as the weeks move forward.

Finally, can you please let us know how many documents the Famous plaintiffs expect to produce this week?

Peter

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**From:** Willsey, Peter  
**Sent:** Wednesday, January 30, 2008 1:46 PM  
**To:** 'Samanta, Tina'  
**Cc:** McKinnon, Shannon; Wieder, Stephen; Bennett, Iris E; Christopher McGrath; sdonofrio@mindspring.com; jlg@jlgraubart.com; Arato, Cynthia S.  
**Subject:** RE: In re: XM Satellite Radio Copyright Litigation

Tina --

I have been in meetings for much of the past two days and will be travelling for the remainder of the day. I will try to get you a substantive response tomorrow morning.

Peter

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**From:** Samanta, Tina [mailto:TSamanta@gibsondunn.com]  
**Sent:** Tuesday, January 29, 2008 1:37 PM  
**To:** Willsey, Peter  
**Cc:** McKinnon, Shannon; Wieder, Stephen; Bennett, Iris E; Christopher McGrath; sdonofrio@mindspring.com; jlg@jlgraubart.com; Arato, Cynthia S.  
**Subject:** In re: XM Satellite Radio Copyright Litigation

Peter:

We received your January 25, 2008 letter regarding document production. In order to manage our review of XM's production, can you let us know the anticipated total volume of the production? In addition, can you let us know what the volume of XM's initial production will be this week?

Regards,  
Tina

**Tina Samanta**

2/25/2008

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"MMS <Gibsondunn.net>" made the following annotations.

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